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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PENÄ GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

v.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF
ADELANTO, a municipal entity; GEO
LIEUTENANT DURAN, sued in her
individual capacity; GEO
LIEUTENANT DIAZ, sued in her
individual capacity; GEO
SERGEANT CAMPOS, sued in his
individual capacity; SARAH JONES,
sued in her individual capacity; THE
UNITED STATES OF AMERICA;
and DOES 1-10, individuals,

Defendants.

Case No. 5:18-cv-01125-SP
[Honorable Sheri Pym]

JOINT EXHIBIT LIST

Pretrial Conference

Date: January 21, 2020
Time: 10:00 a.m.
Ctrm: 3

TRIAL

Trial date: February 3, 2020
Time: 9:00 a.m.
Ctrm: 3

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THE GEO GROUP, INC., CAMPOS, and DIAZ.

**TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF
RECORD:**

Pursuant to Local Rule 16-6.1, the parties submit the following: (1) Joint Exhibit List (Exhibit Nos. A through O); (2) Plaintiffs' Exhibit List with Objections (Exhibit Nos. 1 through 119); and (3) Defendants' Exhibit List with Objections (Exhibit Nos. 200 through 243).

The parties reserve the right to amend, modify or supplement this list. The parties further reserve the right to introduce into evidence any of the exhibits listed on each others' Exhibit Lists, including those for which their objections are overruled.

JOINT EXHIBIT LIST

No.	Description	Date Identified	Date Admitted
A.	Surveillance Video Recording of Incident (GEO00668) [Pls' Ex. 1; Defs' Ex. 204]		
B.	Water Temperatures logs Adelanto Detention Center (GEO 05407-0514) [Pls' Ex. 44; Defs' Ex. 219]		
C.	After-Action Review Report dated June 13, 2017 (GEO02238-02240) [Pls' Ex. 36; Defs' Ex. 222]		
D.	GEO Corrections & Detention, Adelanto ICE Processing Center – Use of Force Policy (GEO 01986- 02002) [Pls' Ex. 70; Defs' Ex. 227]		
E.	GEO Corrections & Detention, Adelanto ICE Processing Center – Restrictive Housing Units (formerly Special Management-Segregation)		

No.	Description	Date Identified	Date Admitted
	Policy (GEO 01969-1985) [Pls' Ex. 73; Defs' Ex. 230]		
F.	GEO Corrections & Detention, Adelanto Detention Facility – Detainee Access to Telephone Policy (GEO 02003-2009) [Defts' Ex. 228]		
G.	GEO Training Materials – Use of Force (GEO 02083-02168) [Pls' Ex. 72; Defs' Ex. 231]		
H.	Plaintiff Julio Barahona Cornejo's Medical Report on Injuries, (GEO 02243). [Pls' Ex. 9; Part of Defs' Ex. 211]		
I.	Plaintiff Isaac Lopez-Castillo's Medical Report on Injuries, (GEO 01055/ 02250). [Pls' Ex. 10; Part of Defs' Ex. 207]		
J.	Plaintiff Omar Rivera-Martinez's Medical Report on Injuries, (GEO 02242). [Pls' Ex. 11; Part of Defs' Ex. 201]		
K.	Plaintiff Alexander Burgos Mejia's Medical Report on Injuries, (GEO 00874/ 02247). [Pls' Ex. 12; Part of Defs' Ex. 205]		
L.	Plaintiff Luis Pena Garcia's Medical Report on Injuries, (GEO 01702/ 02246).		

No.	Description	Date Identified	Date Admitted
	[Pls' Ex. 13; Part of Defs' Ex. 213]		
M.	Plaintiff Marvin Grande Rodriguez's Medical Report on Injuries, (GEO 01858/ 02248). [Pls' Ex. 14; Part of Defs' Ex. 215]		
N.	Plaintiff Jose Cortez Diaz's Medical Report on Injuries, (GEO 01391, 02244) [Pls' Ex. 15; Part of Defs' Ex. 209]		
O.	Plaintiff Josue Lemus Campos's Medical Report on Injuries, (GEO 00525, 02249) [Pls' Ex. 16; Part of Defs' Ex. 202]		

PLAINTIFF'S EXHIBIT LIST

No.	Description	Date Identified	Date Admitted	Objections
1	Surveillance Video (GEO 668)			No objection.
2	List of Demands produced by Plaintiffs as P000199-200.			Irrelevant. FRE 402, 403. Relies on hearsay.
3	Medical Records signed by Dr. Medrano			Defendants reserve the right to object after further identification of the exhibit.
4	Medical records of dental and nursing encounters			Irrelevant. FRE 402, 403.

No.	Description	Date Identified	Date Admitted	Objections
	for Mr. Rivera Martinez			Relies on hearsay. Lacks foundation. FRE 901, 602. Defendants reserve the right to object after further identification of the exhibit.
5	Records of psychological encounter within the facility for Mr. Rivera Martinez (with Dr. Duelen)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901, 602. Defendants reserve the right to object after further identification of the exhibit.
6	Dorm Officer Logbook from June 12, 2017 produced by GEO as GEO05119-05207.			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901, 602. Not best evidence.
7	June 22, 2017 Office of Civil Rights and Civil Liberties Complaint filed by Nicole Ramos (P000190-000195)			Relies on inadmissible hearsay. Lacks foundation. FRE 901. Irrelevant. FRE 402, 403. Lack of foundation/speculation. FRE 602. Improper legal analysis/conclusion. Argumentative.

No.	Description	Date Identified	Date Admitted	Objections
				Ms. Ramos, an attorney, provides opinions on the events that purportedly took place at the Facility. This is unreliable “expert” opinion. Fed. R. Evid. 702. <i>See Daubert v. Merrell Dow Pharms., Inc.</i> 43 F.3d 1311, 1315, 1321 n. 17 (9th Cir. 1995).
8	July 5, 2017 Office of Civil Rights and Civil Liberties Complaint filed by Nicole Ramos (P000158-000160)			Relies on inadmissible hearsay. Lacks foundation. FRE 901. Irrelevant. FRE 402, 403. Lack of foundation/speculation. FRE 602. Improper legal analysis/conclusion. Argumentative. Ms. Ramos, an attorney, provides opinions on the events that purportedly took place at the Facility, investigations, and the appropriateness of actions taken. This is unreliable “expert” opinion. Fed. R. Evid. 702. <i>See Daubert v. Merrell Dow Pharms., Inc.</i> 43 F.3d 1311, 1315, 1321 n. 17 (9th Cir. 1995).

No.	Description	Date Identified	Date Admitted	Objections
9	Plaintiff Julio Barahona Cornejo's Medical Report on Injuries, produced by GEO as GEO 02243.			No objection.
10	Plaintiff Isaac Lopez-Castillo's Medical Report on Injuries, produced by GEO as GEO 01055.			No objection.
11	Plaintiff Omar Rivera-Martinez's Medical Report on Injuries, produced by GEO as GEO 02242.			No objection.
12	Plaintiff Alexander Burgos Mejia's Medical Report on Injuries, produced by GEO as GEO 00874.			No objection.
13	Plaintiff Luis Pena Garcia's Medical Report on Injuries, produced by GEO as GEO 01702.			No objection.
14	Plaintiff Marvin Grande Rodriguez's Medical Report on Injuries, produced by GEO as GEO 01858.			No objection.
15	Plaintiff Jose Cortez Diaz's Medical Report on Injuries, produced by GEO as GEO 01391.			No objection.
16	Plaintiff Josue Lemus Campos's Medical Report on Injuries, produced by GEO as GEO 00525.			No objection.
17	Adelanto Emergency			Irrelevant and

No.	Description	Date Identified	Date Admitted	Objections
	Plans Manual: Hunger Strike Response Plan (GEO 02010-02014)			immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i> , 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i> , 109 F.3d 427, 430 (8th Cir. 1997)).
18	Defendant City of Adelanto's Responses to Plaintiffs' Requests for Admissions, Set One, dated on May 17, 2019.			<p>Defendant City is no longer a party to this matter and, thus, responses regarding its "involvement" are irrelevant and immaterial. FRE 402, 403.</p> <p>Defendants reserve the right to include additional objections after further identification of the exhibit.</p>
19	Defendant City of Adelanto's Responses to Josue Mateo Lemus Campos's Interrogatories, Set One, dated on May 17, 2019.			<p>Defendant City is no longer a party to this matter and, thus, responses regarding its "involvement" are irrelevant and immaterial. FRE 402, 403.</p> <p>Defendants reserve the right to include additional objections</p>

No.	Description	Date Identified	Date Admitted	Objections
				after further identification of the exhibit.
20	Defendant the GEO Group, Inc.'s Responses to Plaintiff Julio Cesar Barahona Cornejo's Interrogatories, Set One, dated on May 17, 2019.			<p>Not best evidence. To the extent that the responses relate to policies and procedures, irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i>, 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i>, 109 F.3d 427, 430 (8th Cir. 1997)). Irrelevant. FRE 402, 403.</p> <p>Defendants reserve the right to object after further identification of the exhibit.</p>
21	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set One			<p>Not best evidence. To the extent that the responses relate to policies and procedures, irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i>, 568 F.3d 1063, 1070 (9th Cir.</p>

No.	Description	Date Identified	Date Admitted	Objections
				<p>2009) (<i>quoting Gardner v. Howard</i>, 109 F.3d 427, 430 (8th Cir. 1997)). Irrelevant. FRE 402, 403.</p> <p>Defendants reserve the right to object after further identification of the exhibit.</p>
22	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set Two			<p>Not best evidence. To the extent that the responses relate to policies and procedures, irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i>, 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i>, 109 F.3d 427, 430 (8th Cir. 1997)). Irrelevant. FRE 402, 403.</p> <p>Defendants reserve the right to object after further identification of the exhibit.</p>
23	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set Three			<p>Not best evidence. To the extent that the responses relate to policies and</p>

No.	Description	Date Identified	Date Admitted	Objections
				<p>procedures, irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i>, 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i>, 109 F.3d 427, 430 (8th Cir. 1997)). Irrelevant. FRE 402, 403.</p> <p>Defendants reserve the right to object after further identification of the exhibit.</p>
24	Defendant GEO Group, Inc.'s Responses to Plaintiff's Requests for Production, Set Four			<p>Not best evidence. To the extent that the responses relate to policies and procedures, irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i>, 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i>, 109 F.3d 427, 430 (8th Cir. 1997)). Irrelevant. FRE 402, 403.</p>

No.	Description	Date Identified	Date Admitted	Objections
				Defendants reserve the right to object after further identification of the exhibit.
25	WITHDRAWN			
26	General Incident Report - R. Gillon (GEO 02275-02276)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
27	General Incident Report - A. Burks (GEO 02272-02273)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
28	General Incident Report - J. Marmolejo (GEO 02270-02271)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
29	General Incident Report - G. Martinez (GEO			Irrelevant. FRE 402, 403.

No.	Description	Date Identified	Date Admitted	Objections
	02267-02268)			Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
30	General Incident Report – L. Lacy (GEO 02264-02265)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
31	General Incident Report - A. Reyes (GEO 02261-02262)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
32	General Incident Report - F. Juarez (GEO 02258-02259)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.

No.	Description	Date Identified	Date Admitted	Objections
33	General Incident Report - Alvaro Lanuza (GEO 02255-02256)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
34	General Incident Report - Giovanni Campos (GEO 02251-02253)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
35	Use of Force Report - Jane Diaz (GEO 02236-02237)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Not best evidence.
36	After-Action Review Report (GEO 02238-02240)			No objection.
37	Letter from Attorney Nicole Ramos to Adelanto Detention Center (P000158-000163)			Relies on inadmissible hearsay. Lacks foundation. FRE 901. Irrelevant. FRE 402,

No.	Description	Date Identified	Date Admitted	Objections
				403. Lack of foundation/ speculation. FRE 602. Improper legal analysis/conclusion. Argumentative. Ms. Ramos, an attorney, provides opinions on the events that purportedly took place at the Facility, investigations, and provide opinions on the appropriateness of conduct taken by GEO employees. This is unreliable “expert” opinion. Fed. R. Evid. 702. <i>See Daubert v.</i> <i>Merrell Dow Pharms.,</i> <i>Inc.</i> 43 F.3d 1311, 1315, 1321 n. 17 (9th Cir. 1995).
38	Voicemail from Lieutenant Barry Belt to Attorney Nicole Ramos (P000188)			Not best evidence. Lacks foundation. FRE 901.
39	A. Video Still, view C-1 at 6:30:51; B. Video Still, view C-3 at 6:34:24; C. Video Still, view C-3 at 6:34:28; D. Video Still, view C-2 at 6:22:24; E. Video Still, view C-3 at 6:32:66; F. Video Still, view			No objection.

No.	Description	Date Identified	Date Admitted	Objections
	C-3 at 6:46:56; G. Video Still, view C-3 at 6:46:52; H. Video Still, view C-3 at 6:46:46; I. Video Still, view C-1 at 6:48:24; J. Video Still, view C-3 at 6:35:15; K. Video Still, view C-3 at 6:35:26; L. Video Still, view C-3 at 6:36:50; M. Video Still, view C-3 at 6:38:19; N. Video Still, view C-3 at 6:46:52; O. Video Still, view C-2 at 6:38:54; P. Video Still, view C-2 at 6:39:36; Q. Video Still, view C-2 at 6:40:38; R. Video Still, view C-2 at 6:45:59; S. Video Still, view C-3 at 6:46:21; T. Video Still, view C-3 at 6:46:23; U. Video Still, view C-3 at 6:47:52; V. Video Still, view C-4 at 6:48:35; W. Video Still, view			

No.	Description	Date Identified	Date Admitted	Objections
	C-4 at 6:49:14.			
40	Plaintiff Rivera Martinez's grievances regarding phone number blocking (P000461 /GEO 00146)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602.
41	Plaintiff Rivera Martinez' grievance re his dental crown (P000459-000460)			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602.
42	Phone Call recording of Plaintiff Rivera Martinez.			Irrelevant. FRE 402, 403. Relies on hearsay. Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602. Defendants reserve the right to include additional objections after further identification of the exhibit.
43	Plaintiff Lopez Castillo list of blocked phone numbers.			Not best evidence. Irrelevant. FRE 402, 403. Relies on hearsay.

No.	Description	Date Identified	Date Admitted	Objections
				Lacks foundation. FRE 901. Lack of foundation/speculation. FRE 602.
44	Water Temperatures at Adelanto Detention Center.			No objection.
45	Picture of Plaintiff Omar Rivera Martinez (GEO 00135)			Irrelevant. FRE 402, 403.
46	Picture of Plaintiff Luis Pena Garcia (GEO 01738)			Irrelevant. FRE 402, 403.
47	Picture of Plaintiff Mateo Lemos Campos (GEO 00482)			Irrelevant. FRE 402, 403.
48	Picture of Plaintiff Alex Burgos Meijia (GEO 00938)			Irrelevant. FRE 402, 403.
49	Picture of Plaintiff Julio Barahona Cornejo (GEO 01575)			Irrelevant. FRE 402, 403.
50	Picture of Plaintiff Marvin Grande Rodriguez (GEO 01879)			Irrelevant. FRE 402, 403.
51	Picture of Plaintiff Isaac Lopez Castillo (GEO 01078)			Irrelevant. FRE 402, 403.
52	Picture of Jose Bladimir Cortez Diaz (GEO 01244)			Irrelevant. FRE 402, 403.
53	Picture of ninth hunger striker (GEO 01666)			Irrelevant. FRE 402, 403.
54	Emails from Attorney			Relies on inadmissible

No.	Description	Date Identified	Date Admitted	Objections
	Nicole Ramos to Immigration and Customs Enforcement Agency officers (P000161-000163)			hearsay. Lacks foundation. FRE 901, 602. Irrelevant. FRE 402, 403. Argumentative.
55	Declaration of Hussain Turk (P000447-000448)			Irrelevant. FRE 402, 403. Unreliable opinion as to causation regarding medical injuries allegedly sustained by plaintiffs by an attorney. FRE 702. <i>See Daubert v. Merrell Dow Pharms., Inc.</i> , 43 F.3d 1311, 1315, 1321 n. 17 (9th Cir. 1995). Argumentative. Improper legal analysis and conclusion. Relies on inadmissible hearsay. Speculation, lack of foundation. FRE 602.
56	Intergovernmental Services Agreement between ICE and the City of Adelanto, accessed as a public record.			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602.
57	American Civil Liberties Union letter to Gabriel Valdez at ICE produced by Plaintiffs as P000010-14.			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Argumentative. Relies on inadmissible hearsay.

No.	Description	Date Identified	Date Admitted	Objections
58	WITHDRAWN			
59	Martinez: Talton Call #76			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Relies on inadmissible hearsay.
60	Article: "GEO Group Whistleblower Exposes First Amendment Violations, Lack of Officer Training, and Poor Conditions at the Adelanto Detention Center" (P000416-000418)			Relies on hearsay. Irrelevant. FRE 402, 403. Speculation, lack of foundation. FRE 602. Lacks foundation as article is not under penalty of perjury. FRE 901. Unreliable opinion. FRE 702.
61	Article: "Why Immigrant Detainees in California Just Launched A Hunger Strike" (P000419-425)			Relies on hearsay. Irrelevant. FRE 402, 403. Speculation, lack of foundation. FRE 602. Lacks foundation as article is not under penalty of perjury. FRE 901. Unreliable opinion. FRE 702.
62	Article: "Third Death In Immigration Detention Makes the Adelanto Detention Center the Deadliest Facility in 2017" (P000426)			Relies on hearsay. Irrelevant. Fed. R. Evid. 402, 403. Speculation, lack of foundation. Fed. R. Evid. 602. Lacks foundation as article is not under

No.	Description	Date Identified	Date Admitted	Objections
				penalty of perjury. FRE 901. Unreliable opinion. FRE 702.
63	Article: ““We don’t feel OK here’: Detainee deaths, suicide attempts and hunger strikes plague California immigration facility” (P000427-000432)			Relies on hearsay. Irrelevant. FRE 402, 403. Speculation, lack of foundation. FRE 602. Lacks foundation as article is not under penalty of perjury. FRE 901. Unreliable opinion. FRE 702.
64	OIG Report (September 2018)			Relies on hearsay. Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Not best evidence.
65	Report of Plaintiffs’ Expert Dr. Jeffrey Schwartz			Relies on hearsay. Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Not best evidence.
66	Dr. Jeffrey Schwartz CV			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
67	Report of Plaintiffs’ Expert Dr. Homer			Relies on hearsay. Irrelevant. FRE 402,

No.	Description	Date Identified	Date Admitted	Objections
	Venters			403. Lacks foundation. FRE 901, 602. Not best evidence.
68	Dr. Homer Venters CV			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
69	SIR035317 – James Janecka (GEO 02226-02233)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
70	Adelanto Policy & Procedure Manual: Use of Force (GEO 01986-02002)			No objection.
71	Adelanto Policy & Procedure Manual: Detainee Access to Telephone (GEO 02003-02009)			No objection.
72	GEO Group Training Presentation: Use of Force (GEO 02083-02158)			No objection.
73	GEO Group Segregated Housing Unit Policy			Defendants reserve the right to object after further identification of the exhibit. If Plaintiffs are referring to GEO's

No.	Description	Date Identified	Date Admitted	Objections
				policy on Restrictive Housing Units (formerly Special Management-Segregation) Policy [GEO 01969-1985], Defendants have no objection.
74	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Julio Barahona Cornejo (GEO 01535)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
75	Incident of Prohibited Acts and Notice of Charges for Julio Barahona Cornejo (GEO 01539)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
76	Investigation Report for Julio Barahona Cornejo (GEO 01541)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
77	Institution Disciplinary Panel Report for Julio Barahona Cornejo (GEO 01549-50)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
78	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602.

No.	Description	Date Identified	Date Admitted	Objections
	Julio Barahona Cornejo (GEO 01534)			Hearsay.
79	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Isaac Lopez Castillo (GEO 01119)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
80	Incident of Prohibited Acts and Notice of Charges for Isaac Lopez Castillo (GEO 01123)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
81	Investigation Report for Isaac Lopez Castillo (GEO 01125)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
82	Institution Disciplinary Panel Report for Isaac Lopez Castillo (GEO 01133-34)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
83	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Isaac Lopez Castillo (GEO 01118)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
84	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Alexander Burgos Mejia			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.

No.	Description	Date Identified	Date Admitted	Objections
	(GEO 00961)			
85	Incident of Prohibited Acts and Notice of Charges for Alexander Burgos Mejia (GEO 00966)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
86	Investigation Report for Alexander Burgos Mejia (GEO 00968)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
87	Institution Disciplinary Panel Report for Alexander Burgos Mejia (GEO 00976-77)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
88	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Alexander Burgos Mejia (GEO 00960)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
89	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Josue Lemus Campos (GEO 00524)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
90	Incident of Prohibited Acts and Notice of Charges for Josue Lemus Campos (GEO 00528)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.

No.	Description	Date Identified	Date Admitted	Objections
91	Investigation Report for Josue Lemus Campos (GEO 00530)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
92	Institution Disciplinary Panel Report for Josue Lemus Campos (GEO 00538-539)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
93	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Josue Lemus Campos (GEO 00523)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
94	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Luis Pena Garcia (GEO 01744)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
95	Incident of Prohibited Acts and Notice of Charges for Luis Pena Garcia (GEO 01747)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
96	Investigation Report for Luis Pena Garcia (GEO 01749)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
97	Institution Disciplinary			Irrelevant. FRE 402,

No.	Description	Date Identified	Date Admitted	Objections
	Panel Report for Luis Pena Garcia (GEO 01757-58)			403. Lacks foundation. FRE 901, 602. Hearsay.
98	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Luis Pena Garcia (GEO 01743)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
99	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Omar Rivera Martinez (GEO 00165)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
100	Incident of Prohibited Acts and Notice of Charges for Omar Rivera Martinez (GEO 00168)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
101	Investigation Report for Omar Rivera Martinez (GEO 00170)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
102	Institution Disciplinary Panel Report for Omar Rivera Martinez (GEO 00178-79)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
103	Memorandum to Chief J. Johnson from Lt. R.			Irrelevant. FRE 402, 403.

No.	Description	Date Identified	Date Admitted	Objections
	Duran re Disciplinary Segregation Order for Omar Rivera Martinez (GEO 00164)			Lacks foundation. FRE 901, 602. Hearsay.
104	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative Segregation Order for Jose Cortez Diaz (GEO 01390)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
105	Incident of Prohibited Acts and Notice of Charges for Jose Cortez Diaz (GEO 01394)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
106	Investigation Report for Jose Cortez Diaz (GEO 01396)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
107	Institution Disciplinary Panel Report for Jose Cortez Diaz (GEO 01404-05)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
108	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Jose Cortez Diaz (GEO 01389)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
109	Memorandum to Chief J. Johnson from Lt. J. Diaz re Administrative			Irrelevant. FRE 402, 403. Lacks foundation. FRE

No.	Description	Date Identified	Date Admitted	Objections
	Segregation Order for Marvin Grande Rodriguez (GEO 01916)			901, 602. Hearsay.
110	Incident of Prohibited Acts and Notice of Charges for Marvin Grande Rodriguez (GEO 01920)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
111	Investigation Report for Marvin Grande Rodriguez (GEO 01922)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
112	Institution Disciplinary Panel Report for Marvin Grande Rodriguez (GEO 01930-31)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
113	Memorandum to Chief J. Johnson from Lt. R. Duran re Disciplinary Segregation Order for Marvin Grande Rodriguez (GEO 01915)			Irrelevant. FRE 402, 403. Lacks foundation. FRE 901, 602. Hearsay.
114	ICE PBNDS 2011 2.15: Use of Force and Restraints			Irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i> , 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i> ,

No.	Description	Date Identified	Date Admitted	Objections
				109 F.3d 427, 430 (8th Cir. 1997)).
115	ICE PBNDS 2011 4.2: Hunger Strikes			Irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i> , 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i> , 109 F.3d 427, 430 (8th Cir. 1997)).
116	ICE PBNDS 2011 2.8: Population Counts			Irrelevant and immaterial as an alleged policy violation is not a per se violation of the law. FRE 402, 403; <i>Cousins v. Lockyer</i> , 568 F.3d 1063, 1070 (9th Cir. 2009) (<i>quoting Gardner v. Howard</i> , 109 F.3d 427, 430 (8th Cir. 1997)).
117	GEO Group, Inc. 2018 Annual Report			Defendants reserve the right to object after further identification of the exhibit.
118	GEO Group, Inc. Form 10-K for Fiscal Year Ending December 31, 2018			Defendants reserve the right to object after further identification of the exhibit.

No.	Description	Date Identified	Date Admitted	Objections
119	Reserved for Demonstratives			Defendants reserve the right to object after further identification of the exhibit

DEFENDANTS' EXHIBIT LIST

No.	Description	Date Identified	Date Admitted	Objections
200.	Omar Rivera-Martinez's Selected Medical Records From GEO [GEO 00014-00112, 02242]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified. Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
201.	Omar Rivera-Martinez's Selected Facility Records [GEO 00113-00210]			Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the

No.	Description	Date Identified	Date Admitted	Objections
				<p>right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
202.	Josue Lemus-Campos' Selected Medical Records From GEO [GEO 00211-00479, 02249]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
203.	Josue Lemus-Campos' Selected Facility Records [GEO 00480-00570]			Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not

No.	Description	Date Identified	Date Admitted	Objections
				<p>able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
204.	Video recording of incident [GEO 00668]			No objection.
205.	Alexander Burgos-Mejia's Selected Medical Records From GEO [GEO 00669-00893, 02247]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>

No.	Description	Date Identified	Date Admitted	Objections
206.	Alexander Burgos-Mejia's Selected Facility Records [GEO 00894-01013]			<p>Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
207.	Isaac Lopez-Castillo's Selected Medical Records From GEO [GEO 01014-01077, 02250]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than</p>

No.	Description	Date Identified	Date Admitted	Objections
				probative. FRE 401, 402, 403, 801, 802.
208.	Isaac Lopez-Castillo's Selected Facility Records [GEO 01078-01163]			<p>Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
209.	Jose Cortez-Diaz's Selected Medical Records From GEO [GEO 01164-01343, 02244]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception;</p>

No.	Description	Date Identified	Date Admitted	Objections
				Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
210.	Jose Cortez-Diaz's Selected Facility Records [GEO 01344-01438]			Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified. Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
211.	Julio Barahona-Cornejo's Selected Medical Records From GEO [GEO 01439-01514, 02243]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.

No.	Description	Date Identified	Date Admitted	Objections
				Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
212.	Julio Barahona-Cornejo's Selected Facility Records [GEO 01515-01580]			Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified. Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
213.	Luis Pena-Garcia's Selected Medical Records From GEO [GEO 01671-01721, 02246]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to

No.	Description	Date Identified	Date Admitted	Objections
				<p>these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
214.	Luis Pena-Garcia's Selected Facility Records [GEO 01722-01789]			<p>Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
215.	Marvin Grande Rodriguez's Selected Medical Records From GEO [GEO 01790-01878, 02248]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge</p>

No.	Description	Date Identified	Date Admitted	Objections
				<p>informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
216.	Marvin Grande Rodriguez's Selected Facility Records [GEO 01879-01965]			<p>Without identifying the selected facility records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
217.	GEO Adelanto Detainee Handbook (English)			Irrelevant; Lacks Foundation;

No.	Description	Date Identified	Date Admitted	Objections
				Authentication; Confusing the issues. FRE 104, 401, 402, 403, 901.
218.	GEO Adelanto Detainee Handbook (Spanish)			Irrelevant; Lacks Foundation; Authentication; Confusing the issues. FRE 104, 401, 402, 403, 901.
219.	Water Temperature Tests [GEO 05407 – 05412]			No objection.
220.	Records from Talton Communications, Inc.			Irrelevant; Lacks Foundation; Authentication; Confusing the issues. FRE 104, 401, 402, 403, 901.
221.	Audio recordings from Talton Communications, Inc.			Without identifying the selected recordings that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these recordings at trial when they are properly identified. Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401,

No.	Description	Date Identified	Date Admitted	Objections
				402, 403, 801, 802. Third-party privacy rights. Defendants do not need these private phone calls with non-parties to present their case.
222.	After- Action Review Report dated June 13, 2017 [GEO 02238- GEO 02239]			No objection.
223.	Demonstrative diagrams, illustrations, and photographs of the dorm where the Incident occurred			No objection.
224.	Demonstrative diagrams, illustrations, and photographs of the area where Plaintiffs were taken immediately after the Incident			Lacks Foundation; Authentication. FRE 104, 901. Violation of Fed. R. Civ. Proc. 26 (not previously disclosed).
225.	Demonstrative diagrams, illustrations, and photographs of the area where Plaintiffs were decontaminated			Lacks Foundation; Authentication. FRE 104, 901. Violation of Fed. R. Civ. Proc. 26 (not previously disclosed).
226.	Stills from the video recording of the incident			Without identifying the selected stills or timestamps with the corresponding video views (e.g. C1-C4) that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the

No.	Description	Date Identified	Date Admitted	Objections
				right to object to these recordings at trial when they are properly identified. Irrelevant; and Cumulative. FRE 401, 402, 403.
227.	GEO Corrections & Detention, Adelanto ICE Processing Center – Use of Force Policy [GEO 01986-02002]			No objection.
228.	GEO Corrections & Detention, Adelanto Detention Facility – Detainee Access to Telephone Policy			No objection.
229.	GEO Corrections & Detention, Adelanto ICE Processing Center – Control and Use of Chemical Agents Policy [GEO 04539 – 04547]			Irrelevant; Lacks Foundation; Authentication; Confusing the issues. FRE 104, 401, 402, 403, 901.
230.	GEO Corrections & Detention, Adelanto ICE Processing Center – Restrictive Housing Units (formerly Special Management-Segregation) Policy [GEO 01969-1985]			No objection.
231.	GEO Training Materials – Use of Force [GEO 02083-02168]			No objection.
232.	GEO Training Materials – Use of Force Refresher [GEO 05358-05406]			Irrelevant; Lacks Foundation; Authentication; Confusing the Issues

No.	Description	Date Identified	Date Admitted	Objections
				FRE 104, 401, 402, 403, 901.
233.	Select Medical Records from Correct Care Solutions Re Omar Arnaldo Rivera Martinez [JONES 000001- 000270]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
234.	Select Medical Records From Correct Care Solutions Re Isaac Lopez-Castillo [JONES 000271 – 000337]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception;</p>

No.	Description	Date Identified	Date Admitted	Objections
				Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
235.	Select Medical Records From Correct Care Solutions Re Jose Cortez-Diaz [JONES 000338 – 000526]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified. Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
236.	Select Medical Records From Correct Care Solutions Re Josue Lemus-Campos [JONES 000527 – 000626]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.

No.	Description	Date Identified	Date Admitted	Objections
				Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
237.	Select Medical Records From Correct Care Solutions Re Marvin Grande Rodriguez [JONES 000627 –000718]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified. Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.
238.	Select Medical Records From Correct Care Solutions Re Alexander Burgos-Mejia [JONES 000719 –000948]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to

No.	Description	Date Identified	Date Admitted	Objections
				<p>these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
239.	Select Medical Records From Correct Care Solutions Re Luis Pena-Garcia [JONES 000949 – 001002]			<p>Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
240.	Select Medical Records From Correct Care Solutions Re Julio Barahona-Cornejo [JONES 001003 – 001079]			Without identifying the selected medical records that will be introduced at trial, Plaintiffs are not able to lodge

No.	Description	Date Identified	Date Admitted	Objections
				<p>informed objections. Plaintiffs reserve the right to object to these records at trial when they are properly identified.</p> <p>Irrelevant; Hearsay without exception; Cumulative and substantially more prejudicial than probative. FRE 401, 402, 403, 801, 802.</p>
241.	Medical Services Agreement Between GEO and CCS [CCS 001093 – CCS-001118]			Irrelevant; Lacks Foundation; Authentication; Confusing the issues; Hearsay without exception FRE 104, 401, 402, 403, 801, 802, 901.
242.	Records that demonstrate training received by Diaz			Violation of Fed. R. Civ. Proc. 26 (not previously disclosed and requested in discovery).

No.	Description	Date Identified	Date Admitted	Objections
243.	Records that demonstrate training received by Campos			Violation of Fed. R. Civ. Proc. 26 (not previously disclosed and requested in discovery).

The signatory parties reserve the **right to amend** these Exhibit Lists.

Dated: January 14, 2020

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